

WACHTELL, LIPTON, ROSEN & KATZ

MARTIN LIPTON
HERBERT M. WACHTELL
THEODORE N. MIRVIS
EDWARD D. HERLIHY
DANIEL A. NEFF
ANDREW R. BROWNSTEIN
MARC WOLINSKY
STEVEN A. ROSENBLUM
JOHN F. SAVARESE
SCOTT K. CHARLES
JODI J. SCHWARTZ
ADAM O. EMMERICH
RALPH M. LEVENE
RICHARD G. MASON
DAVID M. SILK
ROBIN PANOVKA
DAVID A. KATZ
ILENE KNABLE GOTTS
JEFFREY M. WINTNER
TREVOR S. NORWITZ
BEN M. GERMANA
ANDREW J. NUSSBAUM

RACHELLE SILVERBERG
STEVEN A. COHEN
DEBORAH L. PAUL
DAVID C. KARP
RICHARD K. KIM
JOSHUA R. CAMMAKER
MARK GORDON
JOSEPH D. LARSON
JEANNEMARIE O'BRIEN
WAYNE M. CARLIN
STEPHEN R. DI PRIMA
NICHOLAS G. DEMMO
IGOR KIRMAN
JONATHAN M. MOSES
T. EIKO STANGE
JOHN F. LYNCH
WILLIAM SAVITT
ERIC M. ROSOF
GREGORY E. OSTLING
DAVID B. ANDERS
ANDREA K. WAHLOQUIST

51 WEST 52ND STREET
NEW YORK, N.Y. 10019-6150
TELEPHONE: (212) 403-1000
FACSIMILE: (212) 403-2000

GEORGE A. KATZ (1965-1989)
JAMES H. FOGELSON (1967-1991)
LEONARD M. ROSEN (1965-2014)

OF COUNSEL

WILLIAM T. ALLEN
MARTIN J.E. ARMS
MICHAEL H. BYOWITZ
GEORGE T. CONWAY III
KENNETH B. FORREST
SELWYN B. GOLDBERG
PETER C. HEIN
MEYER G. KOPLOW
LAWRENCE S. MAKOW
DOUGLAS K. MAYER
MARSHALL L. MILLER
PHILIP MINDLIN
DAVID S. NEILL

HAROLD S. NOVIKOFF
LAWRENCE B. PEDOWITZ
ERIC S. ROBINSON
PATRICIA A. ROBINSON*
ERIC M. ROTH
PAUL ROWE
DAVID A. SCHWARTZ
MICHAEL J. SEGAL
ELLIOTT V. STEIN
WARREN R. STERN
PAUL VIZCARRONDO, JR.
PATRICIA A. VLAKHAKIS
AMY R. WOLF

* ADMITTED IN THE DISTRICT OF COLUMBIA

COUNSEL

DAVID M. ADLERSTEIN
SUMITA AHUJA
AMANDA K. ALLEXON
LOUIS J. BARASH
FRANCO CASTELLI
DIANNA CHEN
ANDREW J.H. CHEUNG
PAMELA EHRENKRANZ
KATHRYN GETTLES-ATWA
ADAM M. GOGOLAK

NANCY B. GREENBAUM
MARK A. KOENIG
LAUREN M. KOFKE
J. AUSTIN LYONS
ALICIA C. McCARTHY
PAULA N. RAMOS
NEIL M. SNYDER
S. CHRISTOPHER SZCZERBAN
JEFFREY A. WATIKER

MARK F. VEBLEN
VICTOR GOLDFELD
EDWARD J. LEE
BRANDON C. PRICE
KEVIN S. SCHWARTZ
MICHAEL S. BENN
SABASTIAN V. NILES
ALISON ZIESKE PREISS
TIJANA J. DVORNIC
JENNA E. LEVINE
RYAN A. MCLEOD
ANITHA REDDY
JOHN L. ROBINSON
JOHN R. SOBOLEWSKI
STEVEN WINTER
EMILY D. JOHNSON
JACOB A. KLING
RAAJ S. NARAYAN
VIKTOR SAPEZHNIKOV
MICHAEL J. SCHOBEL
ELINA TETELBAUM

MEMO ENDORSED

USDC-SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: <u>11/25/19</u>

DIRECT DIAL: (212) 403-1262
DIRECT FAX: (212) 403-2262
E-MAIL: MLMILLER@WLRK.COM

APPLICATION GRANTED

November 25, 2019

VIA ELECTRONIC CASE FILING

Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007


Hon. Ronnie Abrams
United States District Court
Dated: 11-25-19

Re: United States v. Jeremy Duran-Cedano, 18 Cr. 149 (RA)

Dear Judge Abrams:

We are counsel to Jeremy Duran-Cedano, the defendant in the above-captioned matter. We write to respectfully request that the pretrial release conditions restricting Mr. Duran-Cedano's travel to New York, New Jersey, and Pennsylvania be lifted to permit him to travel within and throughout the United States.

Since early 2019, Mr. Duran-Cedano has been employed as a freight delivery driver by New Jersey-based delivery companies that operate principally as subcontractors for Amazon.com, Inc. On January 24, 2019, in connection with the commencement of Mr. Duran-Cedano's employment as a delivery driver, the Court added Pennsylvania to the list of

Honorable Ronnie Abrams
November 25, 2019
Page 2

jurisdictions—previously only New York and New Jersey—to which Mr. Duran-Cedano is permitted to travel. Since then, Mr. Duran-Cedano has serviced delivery routes across all three states without incident and has been named ‘Employee of the Week’ by his employer on multiple occasions.

In recognition of his performance to date, track record of reliability, and experience with longer delivery routes, his employer, Renaga2, LLC, has offered Mr. Duran-Cedano the opportunity to service an expanded set of routes that would include transfers of freight between, and deliveries to, sites in Massachusetts and Virginia, in addition to the Amazon fulfillment centers and other sites he already services in New York, New Jersey, and Pennsylvania. These additional routes would enable Mr. Duran-Cedano to record additional work hours, increase his take-home pay, and progress within the company.

Since his release from custody in November 2017, Mr. Duran-Cedano has strictly adhered to his pretrial release conditions. In connection with his work as a delivery driver, Mr. Duran-Cedano has closely coordinated with Pretrial Services as to his work activities and travel schedules to ensure compliance with applicable restrictions on his travel, and he will continue to do so.

In view of Mr. Duran-Cedano’s record of strict compliance with pretrial supervision to date, his commitment to his obligations as a Young Adult Opportunity Program participant, and the opportunities for professional growth that Mr. Duran-Cedano has attained, we respectfully request that the Court amend Mr. Duran-Cedano’s pretrial release conditions to lift current state-specific travel restrictions and permit him to travel within and throughout the United States. Should the Court grant this relief, all other pretrial release conditions, including that Mr. Duran-Cedano submit to supervision as directed by Pretrial Services, would remain in place.

The government and Pretrial Services are aware of this application, and neither objects to the requested relief.

Thank you for Your Honor’s consideration.

Respectfully yours,


Marshall L. Miller

CC: AUSA Alison G. Moe, Esq.
Pretrial Services Officer Rena Bolin